United States District Court Eastern District of Michigan Southern Division

Randall Thomas Plaintiff,

Case:2:16-cv-10813 Judge: Cohn, Avern MJ: Stafford, Elizabeth A. Filed: 03-07-2016 At 03:35 PM CMP THOMAS VS FERNDALE PUBLIC SCHOO

Ferndale Public School, a Michigan Public School in the State of Michigan, Gary Meier, individually and in his official capacity as The Ferndale Public school Superintendent, John Carlson, individually and in his official capacity as the Attorney for Ferndale Henry Gold, individually and in his official Capacity as the Fernphale Public School Vice Rochely individually and in her Official capacity as the Ferndale Public School Princial of Rossevelt school Ferndale Public School Board, an Mychigen Public School Board for the Ferndule Aublic School in the city of Ferndale Michigan,



## Complaint and Jury Demand

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this court and dismissed or transferred after having and dismissed or transferred after having any other civil action, not between these parties arising out of the same transaction occurrences as alleged in this Complaint that is pending or was previously filed and of after been assigned to a Judge.

Now Comes the Plaintiff Randall
Thomas, and his Complaint against the
Defendants Ferndale Public School
Stated unto this Honorable Count as Follows:

- 1.) This action is brought pursuant of Title VI of the Civil Rights Act on the basis of race, color or national
- 2) Title IX of the Education Amendment of 1972, which prohibit discrimination
- Act of 1973, which prohibits discrimination on the basis of disability.
- Act of 1990, which prohibits discrimination.

  on the basis of disability:

5) This action is brought pursuant to the Boy Scouts of America Equal Access Act part of the No Child Left Behind Act of 2001, which prohibits denial of access to or other discrimination against the Boy Scouts or other elementary schools, public secondary schools, local education agencies, and a designated open forum or limited

6) This action is brought pursuant to the Elliott-Larsen Club Right Act of 1964, as amended

7) This action is brought pursuant to the Americans with Disabilities Act of 1990, 42

8) This action is brought pursuant to the Aichigan Persons with Disabilities Act No. 220, Public Acts of 1976, as Amended,

- 9.) Plaintiff address is 22917 Woodward, Ferndale Michigan 48220.
- 10) The address's where the alleged discrimination, Libel and Slander
  - 11) The alleged discriminatory acts accurred from September 2012 to
  - 12.) Charges were filed with the michigan Civil Rights Commission regarding Defendant's alleged discriminatory conduct on 2012-2015

The acts complained of in the suit Vidate Federal Laws Regarding race, gender disability, retaliation, Hostile Education environment, Failue to make reasonable accommodations failure to educate a child verbal intimidation, Films a Faulse Police Report, Slander, Libel, Powenting Rights and other Civil Rights Violetions harassment Intimidation, oppression,



## General Allegations

- 13.) Plaintiff is a Resident of the City of Ferndale, county of Oakland, and State of Michigan.
- 14) Plaintiff address is 22917 woodward, Ferndale, Michigan 48220.
  - 15) Defendant is a Ferndale Public School In the City of Ferndale, Michigan 48220
  - 16) Plaintiff is an African-American male, That Fact was known to Defendant at all times relevant to this litigation.
  - 17.) On or around Sept 2012 Plaintiff
    enrolled his then 5 yrs old son in Defendants
    school Reservative & school in the City of Ferndale
    Mi.
- 18,000 Plaintiff first day at Defendant.
  Ferndale School, Plantiff child fist.
  Day of enrolement, Rlamtiff filed
  out Partenter Card emergency
  card etc. with Defendant
  Ferndale School.

19) Before Plaintiff en Robert

This their 5ym son in Defendant

Reviole School, Plaintiff went

before his Capstody Judge

in Papentus cuse 200-763699-00

Before the Sept 2012 en rolmente

school at Defendants Ferndale

20.) Plaintiff was given an Dudge from the court (fam. 12)
Judge to Custady Case \$#08-763599-08 Order Plaintiff the custablyan Parent of his then syr son Randa Thomas the Panenters Right to Pick and Chose "any" school of His choseing and the He Court would only agel or disagril along with mother whoma is the Castondral Pommet engled to allow Plaintiff the Rountal Right to Packe and chase what ever school of Plaintiff chose and Report

@ (I)

ABNOTOR Sept 2012, Ofter the time in which Pantiff had enrolled this then syn son in Defendants school, Plaintiff made many complaints about civil Rights Act Violation, Parenting Rights Violation alleged race discrimination, Gender discrimination Slander, Libe harrament, Faste Allogation of Assault, Disorderly Conduct threats and Coushion corruption, Genocide, white supremacy by up hangement, by Ferndale Public School with the intent to make Plantiff Lose his Parental Rights to his son & so that Plaintiff wound not be able to come to Defundant Ferndale Public School to Praticulabet in Plaintiff son Education Based on Defendants Falsification and Discrimination towards Plaintiff and the Gender Discrimination alleged towards Plaintiff by Defendant from sept 2012 to Plaintiff trial on or about February 2014 these compaints went to Defendant as little also to the michigan Department of CIVIL Rights For the Investigation of Plaintiffs complaint eiginst Defendant for the alleged violations, see Dept of

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22.) During the time as where Plaintiff Son Rande Thomas Attended Defentants Ferndale Public School, Plaint: FF at one time or another, Plaintiff the non-custodual Parent was subject to a Defecto White Supremary Policy to Oppression and Discrimination Harrissing Un Haman of His Dignity as a man a Father under a Protected civil rughts class and Disabiliti threats, Intimidation, violation of Plaintiff Parenting Rights and Visitaion Rtshts, based and spelled out completly in vistion order From Oakland country Family court order case 09-763599 PP and Given to the Defendant on or about December 2012 and was updated through out the time Planififf son Attended Defendants Ferndale School. Defendants Intentional Infliction of Discriminal Harassment, Falsification of Plaintiff of Discriminal Transformation of Plaintiff of Disorderly Conduct, Trespassing, safety concerns Violation of school Rules where charage agist Plaintiff by Defendant and Defector Policy to Discrimination asinst Plaintiff and the Violation of Plaintiff Civil, Paranting, Visition Rishts By Defendant without an Bue Rights by Defendant without an Due Process of Rights and a fair Investagation an non-Disciminatory Due Process of Plaintiff Rights by Defendant Ferndale school Borard Refore any Discipling against Plaintiff Violation or any School Policys and Before Violation or any School Policys and Before Suspendent of Plaintiff Disciplined Plaintiff by Short-Term/Long Term Suspendents or Expulsion and without an formal non Discriminatory heaving on False Crimes and or other illegal or indecent acts.

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23) Defendant denved Plaintiff a fair and Equel Parenting enviorment to sheare in his child Educature Develiopment Process at Defendant Férndale School, Defendant Defecto Policy of
Discrimination intimidation and violintion
of Plantiff ADA Disability eights with the risht to have an Hassment Free Nondiscrimination, incusive to Parents(ALL) Laws (FERPA) Title VII of Civil Rights Acts of 1964, Title IX of Education Amendments of 1972 Section 504 of Rehabilitation Act of 1973, the Americans of Disability Act of 1990 and all other policy to Protect the Family/Child sudent Relationship in a Educational School (Public) These Policys and Move where All Violated Alleged By Defendant toward Plaintiff and Plaintiff Child by Dining Plantiff the Right to have an Parient Teachers Conserce with Plaintiff and Defendant regards to Plaintiff Childs education enviorment, safty, mental healt, special needs, Disiplian, Absences. Truancy, Attendance, Grading, Homework, School-Activities, Graduation, Expulsion, Formal Discipling Etc. - Defendant held a Defecto discriminatory Policy to violate Plaintiff of these Rights

10) 24) Durns the time in which Plaintiff Child attended Defendants Ferndale School, On or around Dec of 2012 Plaintiff called and set a Passent tearcher Conforance at Defendants Ferndale School between Plaintiff and Defendant Kindigarter teacher to dicuses Plaintiff child Education Progress and needs, During this Confurance Defendant created and Defecto Place to Discrimination False allegation, intimidation, harrasment threats and commellon toward Plaintiff while Plaintiff was at Defendant Ferndale School in the Parent techar Confercen with Defendant, Defendand teacher refused to disclose the information Regrade to Plantiffs Childs "Homework" (lass Room work" Need Grades, Suspenson Tryancy ability, Spelal & 25,) Plaintiff was forged out of this Parent teacher confunce for Discriminatory Defecto Policy to violate Plaintiffs Rishts to his Child Educational Process and Cover-up the Lack of Education Support FOR Plaintiff Child By mothers "Attendance Tryancy Tardiness, school work, Home work for Plaintiff Child Picht under Tryancy Deinery Plaintiff the Right under (FERPA) and other Federal Law for non-Disscimination Regrands to Educational Rights and Clust Rights

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School Activities (Pictor Day) reading ability, Spelal need Grades, suspension, Tryancy ability, s 25,) Plaintiff was forged out of this Parent teacher confince for Discriminatory Defecto Policy to violate Plaintiffs Rishts To his Child Educational Process and Cover-up the Lack of Education Support
FOR Plantiff Child By mothers "Attendance Tryancy
Tardiness, school work, Home work for Plantiff Child Deinery Plaintiff the Right under (FERPA) and other Federal Law for non-Disscimination Regrards to Educational Rights and Clube Rights

26,) Duris the time where Plaintiff child attended Defendant Ferndale school Plaintiff Regust to have his child process for spercal needs to to Plaintiff concerns of Child Educational Performances (OR Lack Of), Child inabiting to learn, read, writing a his current Leval of school and Plaintiff own Review of Childs Leanny abity also Plaintiff personal Experace of Dislizinand the Inablity to Read and wrifte at the same leave to Plantiff Child is in. Plaintiff was at Denved the Right to have his Child reviewed for speich need By Defendant which is a violation of Plaintiff Rights as a Parent, Plaintiff appeal to the Family Court Judge in Oakland County and the Judge ask his GAL to Review of Plaintiff and GAL to detirmme if Plaintiff had the Right to have his Child Revived For Special Educat need while a Defendants school, The GAL Plantiff the GAL Beterned that the Plaintiff had the propert to have the Defendant have his Child Reviewed for special needs and the Defendant First Denial was then of his Child By Defendant to Review Child for

27) During the Force Review of the Plaintiff Child for Special need the Defendants Denned the Plaintiff the Right to give Full Imput into the Full Review of Plaintiffs Child Review For Speical need ex: history, Ability, household experance, Comoly history all other thing that the Revoew allow Plaintiff child mother to profosatate In the Review of the Child assessment e for special need, at Although Defendant was and is fully of aware at the time of Plaintiffs Child Review for spered need that Plaintiff himself had speicul need which was also penned by Defendant by not allow Plantiff Reasonable accommodation at Defendants School, Reading, writing, complaints, Request Etc. -- now at this time Defendant is Deninny Plaintiff and Plaintiff the Pright to Due Process for Plaintiff Childs Special needs. Defendant Defecto Plainty to Denie and or malipilate the review of Plaintiff Child Review for Speial need Resulted in a no need for Special need for Plantiff Child. after this Review Defendant failed child on Childs Report Card Regrads to Read, writing, and many other thems regard to spereal needs.

28,) During the time where Defendant alleged discrimination and Denial of Plaintiff Child special need for any Defendant use its Defecto Policy to Discrimination against Plaintiff bessed on Race, Genger and Parenting Rights when Plaintiff werbal also with the Defendant in writh Right cases.

#09-763599-DP given to the Defendent By the Family Court of Ocicland County
in case \$109-163599- of Restade to Visitation of Plaintiff Child and Plaintiff tours he can and can't Pick up Child From Defendents Fernfale School and whom is to Pick up Child (which farent or Gradien)

From Defendants Ferndale School On or around
1110/al 1 Chool On or around March 2013 Denoted Wolated the Family court order and Plaintiff Rishts to Pickeup his Child Graer and Finite from Defendant School on Plaintiff Court ordered Changed Family Court Judge Order and Policy Observing Court ordered Observing Court order Richt to Partan Line away Plaintiff court order RISM to Partay time with this CW/d and pickup from Dependant School Oakland County Funil) court ordrer without in the

Plaintiffs child attended Defendant made discriminatory oppressive intimidating
Falsifatiation frundment claims of Trespassy Conduct Trugney EducaiaL restect
to Child Threats and Countion to the Ogkland count family court, Ferdale Palice Dept, Department of Human sorvice child Protective Service, child mother Defendant own special need nept, to the Child himself by Defendants superintendent at the time Gary Meler, Defendant Deputy Superintendent Henry Gold, Roosevelt Elemetary Princial Diana Rochely Feandale Public School Board of Education, and Ferndale Public School Aty Last time Berns on or about march 7 2013
Falsificated run of Assault and or Disorderly 2013
Retald in the attempted pept by Defendant, and
OI-1.66 6... II. Nank-1... Plaintiff for the Racketzerny Genocidale corruption, oppressive discriminatory Claims By Defendant at the Trial of Plaintiff by the Ferndale city and police on or about February 2014 in CaseXDistrict 13-70924 where the case was later dismissing aginst Plantiff Randall Thomas.

39,) Defendant mentanel q Defecto Policy of discrimination aginst Plaintiff Randall Thans for Plaintiffs Randall Thomas alleged Violation of Defendant Policy at Ferndale Public School, where 95 Defendant used a Diffirmt Policy and Term with a inclusive on Partenership, non-Discriminatory policy for the child mother Sherry krehardson on other white Parents at Ferndale Publiz School, where it come to Truancy, family Court orders Report Card, School Activities! and the reporting of Disorderly' conduct to the courts, DHS, Child protective Services, special need for the Child these allege violicions are a Direct resauld of Defendants and its agents Discrimination policy asinst Plaintiff and violation of his pantantry/position Right Civil Rights to his Child and Human

(6) 3D Durry the time where as -Plaintiff Child attended Defendant Ferndale School, Defendant used it Deputy Superintendant, Ferndale Police Dept and Plagent Rige Police Dept to Chase, ThreEm, intimidate harrass Plaintiff, Plaintiffs child, and Plantiff mother whom where all together, on ar around march 2013 at Défendants se hool but Down the Block - in Plasant Renge mi walking to the car, when Defendant and Police Chase Plaintiff, Child, and mother to the Car Stoped the Car Fromo mours attended Ferndale Police and ased Defendant Deputy Superintendant Hard Gold
to threaten & Plaintiff not to Come Back to Defendants School Roosevelt Elementary without every housely any Fact-finding. Investigation for a fair and Equal out come this was mother and Child by Discrimination and oppression and violation of Plaintiff Rights,

Wherefor, Plaintiff
Seeks all damages allowable
against Defendants in a amount
exceeding one million doublars
(1,000,000,00), not inclusive of cost
interest, and attorney frees, Plaintiff
also demands such other relief as the
Court.

By Randall Thomas
3/7/16
\* Rell M

(8)

Counts

Aforementioned in the earlier number of complaints 1—3], plaintiff accuses defendant of numerous federal law violations not limited to racial discrimination, retaliation, excessive force, gender discrimination, lying under oath, making a false police report, violation of family court order 09-763599-DP, and various other violations that will be discovered in this case.

THE ACTS OF DEFENDANTS AS DESCRIBED CONSTITUE INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.

Rall M

ivil cover sheet and the information by local rules of court. This form, ap a of initiating the civil docket sheet. (St	813-AC-EASTEDS  contained herein neither replace is contained by the Judicial Conference  ENSTRICTIONS ON NEXT PAGE	nor supplement the filing and ser		s as required by law, except as of the Clerk of Court for the	
(a) PLAINTIFFS  Randall Th  (b) County of Residence of First Listed Pla  (EXCEPT IN U.S. PL  27917 Woodwo  (c) Attorneys (Firm Name, Address, and Teleph	intiff Ogkland AINTIFF CASES) rd Ave Fernd	County of Resider  NOTE: IN LAND THE TRA  Attorneys (If Know	County of Residence of First Listed Defendant Oakland  (IN U.S. PLAINTIFF CASES ONLY)  NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.  Attorneys (If Known)		
		III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff (For Diversity Cases Only) and One Box for Defendant)			
U.S. Government  Plaintiff  (U.S. G	uestion overnment Not a Party)	Citizen of This State	PTF DEF O 1 O 1 Incorporated or P of Business In	•	
U.S. Government	e Citizenship of Parties in Item III)	Citizen of Another State	☐ 2 ☐ 2 Incorporated and of Business In		
		Citizen or Subject of a Foreign Country	☐ 3 ☐ 3 Foreign Nation	06 06	
NATURE OF SUIT (Place on "X" in One Box Only)					
O Insurance O Marine O Miller Act O Negotiable Instrument O Recovery of Overpayment & Enforcement of Judgment I Medicare Act Recovery of Defaulted Student Loans (Excludes Veterans) Recovery of Overpayment of Veteran's Benefits Stockholders' Suits Other Contract Contract Product Liability Franchise  Defaulted Student Loans (Excludes Veterans) Recovery of Overpayment of Veteran's Benefits Stockholders' Suits Other Contract Contract Product Liability Franchise  Defaulted Student Loans (Excludes Veterans) Recovery of Overpayment of Veteran's Benefits Stockholders' Suits Other Contract Contract Product Liability Franchise  Defaulted Student Loans (I ability I atomic Slamder I atomic	365 Personal Injury -   Product Liability     367 Health Care/     Pharmaceutical     Personal Injury     Product Liability     368 Asbestos Personal     Injury Product Liability     PERSONAL PROPER     370 Other Fraud     371 Truth in Lending     380 Other Personal     Property Damage     385 Property Damage     385 Property Damage     385 Property Damage     386 Alien Detainee     510 Motions to Vacate     Sentence     530 General     535 Death Penalty     Other:	of Property 21 USC 881  690 Other  1 ABOR  710 Fair Labor Standards Act 720 Labor/Management Relations 740 Railway Labor Act 151 Family and Medical Leave Act 790 Other Labor Litigation	422 Appeal 28 USC 158   423 Withdrawal 28 USC 157   426 USC 157   427 USC 158   428 USC 157   429 USC 158   429	□ 375 False Claims Act □ 400 State Reapportionment □ 410 Antitrust □ 430 Banks and Banking □ 450 Commerce □ 460 Deportation □ 470 Racketeer Influenced and Corrupt Organizations □ 480 Consumer Credit □ 490 Cable/Sat TV □ 850 Securities/Commodities/ Exchange □ 890 Other Statutory Actions □ 891 Agricultural Acts □ 893 Environmental Matters □ 895 Freedom of Information Act □ 896 Arbitration □ 899 Administrative Procedure Act/Review or Appeal of Agency Decision □ 950 Constitutionality of State Statutes	
AUSE OF ACTION  Cite the U.S. C Brief description  REQUESTED IN CHECK IF	Appellate Court  ivil Statute under which you are f on of cause:  THIS IS A CLASS ACTION ULE 23, F.R.Cv.P.	(specify,	er District Litigation	f demanded in complaint:  ☐ Yes ☐ No	
SIGNATURE OF ATTORNEY OF RECORD					
PT # AMOUNT	APPLYING IFP	JUDGE	MAG. JUD	GE	

## 3UANF2T10-E00A13-ROEES83EFF No. 1 filed 03/07/16 PageID.21 Page 21 of 21 Yes Is this a case that has been previously dismissed? If yes, give the following information: Court: Case No.: Judge: \_\_\_\_\_ 2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other Yes court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.) If yes, give the following information: Court: Case No.: Judge: \_\_\_\_\_ Notes: